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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

In re J&J Investment Litigation

Case No.: 2:22-cv-00529-GMN-NJK

GEOFF WINKLER, as court-appointed
 receiver for J&J Consulting Services, Inc.,
 an Alaska corporation; J&J Consulting
 Services, Inc., a Nevada corporation; and J
 and J Purchasing LLC, Florida limited
 liability company,

Case No.: 2:23-cv-00703-GMN-NJK

**STIPULATION TO EXTEND
 BRIEFING SCHEDULE FOR CERTAIN
 MOTIONS IN CONNECTION WITH
 CLASS CERTIFICATION AND
 SUMMARY JUDGMENT**

Plaintiff,
 v.

Judge: The Hon. Gloria M. Navarro
 The Hon. Nancy J. Koppe

WELLS FARGO BANK, N.A.,
 Defendant.

1 Pursuant to LR 7-1, LR 7-3(c), LR IA 6-1, and LR IA 6-2, Plaintiffs (“Class Plaintiffs”) in
2 the action styled *In re J&J Investment Litigation*, No. 2:22-cv-00529-GMN-NJK (D. Nev.) (the
3 “Class Action”), Plaintiff Geoff Winkler (the “Receiver” and together with Class Plaintiffs, the
4 “Plaintiffs”) in *Winkler v. Wells Fargo Bank, N.A.*, No. 2:23-cv-00703-GMN-NJK (D. Nev.) (the
5 “Receiver Action” and together the “Actions”) and Defendant Wells Fargo Bank, N.A. (“Wells
6 Fargo”) (collectively, the “Parties”) in the Actions, jointly stipulate as follows:

7 WHEREAS, on June 27, 2023, the Court coordinated these cases for purposes of discovery
8 and case schedule. *See* Class Action, ECF No. 110; Receiver Action ECF No. 22;

9 WHEREAS, on March 3, 2025, Class Plaintiffs filed a motion for class certification. Class
10 Action, ECF No. 188;

11 WHEREAS, on March 14, 2025, Wells Fargo filed its opposition to the motion for class
12 certification. Class Action, ECF No. 198;

13 WHEREAS, Class Plaintiffs’ reply to the motion for class certification is due on April 3,
14 2025. Class Action, ECF No. 186;

15 WHEREAS, Wells Fargo has filed several motions that challenge Plaintiffs’ evidence or
16 experts in connection with class certification. Class Action, ECF Nos. 201, 204, 208;

17 WHEREAS, the Parties are scheduled to begin briefing dispositive motions on April 23,
18 2025. ECF Nos. 171, 186;

19 WHEREAS, additional motions challenging evidence or experts may be filed in connection
20 with class certification or dispositive motions;

21 WHEREAS, due to the complexity of the issues and the need to work on multiple motions
22 simultaneously, the Parties seek to extend the briefing schedules for motions challenging experts
23 or evidence in connection with class certification and summary judgment, which will not impact
24 the case schedule deadlines;

25 WHEREAS, the Parties request that the deadlines for oppositions to such motions be
26 extended by 14 days—allowing a total of 28 days from the date of the motion—and the deadline
27 for replies be extended by 7 days—allowing a total of 14 days from the date of the opposition
28 brief. *See* LR 7-2(b);

1 NOW THEREFORE, the Parties stipulate as follows, subject to the Court's approval:

- 2 (a) The following deadlines apply to motions challenging experts or evidence in
3 connection with class certification and summary judgment, including those
4 currently pending and any filed in the future ("Covered Motions");
- 5 (b) Opposition briefs to Covered Motions shall be filed within 28 days of the filing
6 of the motion;
- 7 (c) Replies in support of Covered Motions shall be filed within 14 days of the filing
8 of the opposition brief.
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1 Dated: March 27, 2025

Respectfully submitted,

2 For Class Plaintiffs:

For Wells Fargo:

3 By: /s/ Daniel C. Girard

By: /s/ Joseph G. Went

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1 UNITED STATES DISTRICT COURT
2 DISTRICT OF NEVADA

3 *In re J&J Investment Litigation*

Case No.: 2:22-cv-00529-GMN-NJK

5 GEOFF WINKLER, as court-appointed
6 receiver for J&J Consulting Services, Inc., an
7 Alaska corporation; J&J Consulting Services,
8 Inc., a Nevada corporation; and J and J
Purchasing LLC, Florida limited liability
company,

9 Plaintiff,

v.

10 WELLS FARGO BANK, N.A.,

11 Defendant.

Case No.: 2:23-cv-00703-GMN-NJK

**ORDER GRANTING STIPULATION
TO EXTEND BRIEFING SCHEDULE
FOR CERTAIN MOTIONS IN
CONNECTION WITH CLASS
CERTIFICATION AND SUMMARY
JUDGMENT**

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13 This matter comes before the Court on the parties' Stipulation to Extend Briefing Schedule
14 for Certain Motions in Connection with Motions for Class Certification and Summary Judgment.
15 Upon consideration of the Stipulation, the Court hereby GRANTS the Stipulation. It is HEREBY
16 ORDERED that:

- 17 (a) The following deadlines apply to motions challenging experts or evidence in
18 connection with class certification and summary judgment, including those
19 currently pending and any filed in the future ("Covered Motions");
20 (b) Opposition briefs to Covered Motions shall be filed within 28 days of the filing
21 of the motion;
22 (c) Replies in support of Covered Motions shall be filed within 14 days of the filing
23 of the opposition brief.

24 **IT IS SO ORDERED.**

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27 DATED: March 28, 2025